1 2 3 4 5 6 7 8 9 10 11 12 13 14	TRUCKER • HUSS A Professional Corporation Clarissa A. Kang (SBN 210660) Michelle Schuller Lewis (SBN 255787) One Embarcadero Center, 12th Floor San Francisco, CA 94111-3628 Tel: 415.788.3111 Fax: 415.421.2017 E-mail: ckang@truckerhuss.com mlewis@truckerhuss.com Attorneys for Defendant Group Long Term Disability Plan for Employees of Oracle America, Inc.  BURKE, WILLIAMS & SORENSEN, LLP Michael B. Bernacchi (SBN 163657) E-mail: mbernacchi@bwslaw.com Connor C. Boyd (SBN 287297) E-mail: cboyd@bwslaw.com 444 South Flower Street, Suite 2400 Los Angeles, CA 90071-2953 Tel: 213.236.0600 Fax: 213.236.2700 Attorneys for Defendant Hartford Life and Accident Insurance Company  UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16			
17	DAVE NAGY,	Case No. 14-CV-00038-JCS	
18 19	Plaintiff, v.	STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING	
20	GROUP LONG TERM	Complaint Served: 01/09/2014	
21	DISABILITY PLAN FOR EMPLOYEES OF ORACLE	Complaint Served: 01/09/2014 Current Response Date: 01/30/2014 New Response Date: 02/28/2014	
22	AMERICA, INC., and HARTFORD LIFE AND ACCIDENT		
23	INSURANCE COMPANY,	Magistrate Judge Joseph C. Spero	
24	Defendants.		
25			
26	Plaintiff Dave Nagy, Defendant Group Long Term Disability Plan for		
27	Employees of Oracle America, Inc. ("Plan"), and Defendant Hartford Life and		
28	Accident Insurance Company ("Hartford), by and through their respective counse		
MS & LP	LA #4840-9636-1752 v1	- 1 - STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING	

1	of record, hereby stipulate and agree that the time for Defendant Plan to file a	
2	responsive pleading to Plaintiff's complaint shall be extended 30 days from January	
3	30, 2014 to February 28, 2014.	
4	Said extension to plead was requested so that counsel for the Plan can obtain	
5	and review their client's file, prepare an appropriate response, and work out tender	
6	of defense issues with Defendant Hartford. The extension will not impact any of	
7	the case management dates currently set by the Court.	
8	IT IS SO STIPULATED.	
9		
10	Dated: January 30, 2014	Law Offices Of Laurence F. Padway
11		
12		By: /s/ Laurence F. Padway [as authorized on January 30, 2014]
13		Laurence F. Padway
14		Attorneys for Plaintiff Dave Nagy
15	D-4-1, I	Tourism Hann D.C.
16	Dated: January, 2014	Trucker Huss, P.C.
17		D
18		By: Clarissa A. Kang
19		Attorneys for Defendant Group Long Term Disability Plan for Employees of Oracle
20		America, Inc.
21	Dated: January 30, 2014	Burke, Williams & Sorensen, LLP Michael B. Bernacchi
22		Connor C. Boyd
23		
24		By: /s/ Michael B. Bernacchi Michael B. Bernacchi
25		Attorneys for Defendant Hartford Life and
26		Accident Insurance Company
27		
28 AMS &		
LLP LAW	LA #4840-9636-1752 v1	- 2 - STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

1 of record, hereby stipulate and agree that the time for Defendant Plan to file a responsive pleading to Plaintiff's complaint shall be extended 30 days from January 2 3 30, 2014 to February 28, 2014. Said extension to plead was requested so that counsel for the Plan can obtain 4 5 and review their client's file, prepare an appropriate response, and work out tender 6 of defense issues with Defendant Hartford. The extension will not impact any of 7 the case management dates currently set by the Court. 8 IT IS SO STIPULATED. 9 10 Dated: January \_\_\_\_\_, 2014 Law Offices Of Laurence F. Padway 11 12 By: Laurence F. Padway Attorneys for Plaintiff Dave Nagy 13 14 Dated: January 30, 2014 15 Trucker Huss, P.C. 16 17 18 Attorneys for Defendant Group Long Term Disability Plan for Employees of Oracle 19 America, Inc. 20 Dated: January 30, 2014 Burke, Williams & Sorensen, LLP 21 Michael B. Bernacchi Connor C. Boyd 22 IT IS SO ORDERED 23 Dated: 2/4/14 By: /s/ Michael B. Bernacchi 24 Michael B. Bernacchi Attorneys for Defendant Hartford Life and 25 Accident Insurance Company 26 27 28

BURKE, WILLIAMS & SORENSEN, LLP
ATTORNEYS AT LAW
LOS ANGELES

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